PATENT
Atty. Docket No. 1823.001
(formerly 121812.00011)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Kluger et al.
Appl. No.:	10/560,914
Filed:	December 16, 2005
For:	WELL SCREEN
Art Unit:	3676
Examiner:	D. Stephenson

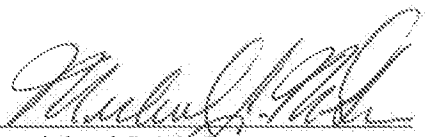
DECLARATON OF G. DOWSETT TRAVERSING GROUNDS OF REJECTION UNDER 37 C.F.R. 1.132

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Attached hereto is a true copy consisting of two pages of a Declaration of G. Dowsett Traversing the Grounds of Rejection under 37 C.F.R. 1.132.

Respectfully submitted,

By: 

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Declaration Under 37 CFR 1.132

I, Graeme Dowsett, the undersigned declarant do hereby state and declare that:

1. I am intimately familiar with the invention described and claimed in the above captioned patent application and that I am one of the co-inventors of the invention described and claimed therein.

2. I am the Chief Executive Officer for Completion Products Pte Ltd, the assignee of the above captioned patent application. I have 15 years of experience in well drilling and down hole equipment used for the extraction of fluids such as oil, gas and water. I hold a Bacholor of Engineering and Bacholor of Business Management and also an active member of the Society of Petroleum Engineers. I consider myself skilled in the area of well screen design and down hole equipment.

3. I have reviewed the pending claims based upon amendments submitted to the USPTO on 22 August 2008. I have also read the office action issued on 5 September 2008 and the arguments presented by the Examiner in light of the cited prior art. In particular I have read the published patent application US2003/0021922 (Bode).

4. I am familiar with the type of well screen shown in Bode. In particular this category of well screen as shown in Bode uses a rigid outer cover as the primary structural element of the well screen. This outer structural cover protects the underlying filter layers from collapse. To this end the outer cover is constructed of a cylindrical plate with perforations placed to allow the flow of liquid through to the filter layers. The underlying filter layers by comparison are wire mesh and so not having the strength of the outer cover. If a well screen of the type described in Bode suffered collapse through failure of the outer cover then I would expect the applied force required to create this collapse would consequently collapse the underlying filter layers. As the filter screens are not sufficiently strong to resist a load higher than the capacity of the outer cover.

5. I note in the office action dated 5 September 2008 that the Examiner has relied on Bode and in particular Figure 6. In particular I also note that the Examiner has identified the thickness of the outer member in Figure 6 and stated that this is representative of the strength of the outer cover compared to the apparent thicker underlying layers. Having read Bode and being familiar with this category of well screen, I find Figure 6 to be unrepresentative of this category of well screen. I have also noticed Figure 3 from the same published application whereby the outer member 22 is seen as being substantially thicker than the member shown in Figure 6. This is more representative of this category of well screen and Figure 3 in my opinion is therefore more relevant than Figure 6 in terms of the thickness of the cover 22. I have also read the specification and in particular paragraph [0029] that states that the outer member 22 should be constructed with a sufficient wall thickness to withstand the down hole radial pressure in the well including pressure created by collapsing walls of the well bore. This is also consistent with my understanding of this category of well screen and also that shown in Figure 3. In my opinion Figure 6 is not consistent with this statement or with that shown in Figure 3 and therefore in my opinion Figure 6 provides no useful information as to the strength of the outer member 22.

6. With regard to Figure 3 it should be noted that with regard to capacity against collapse, a solid cylindrical plate as shown in Figure 3 will have substantially more strength than the wire mesh which is represented by the various layers beneath the outer member 22. Thus whilst the Figures may show the underlying filter layers are thicker, because they are made of a mesh, they will not be of the same strength as the outer member 22. This is also consistent with my understanding of this category of well screen and also from what I understand is described in Bode.

7. Comparing Bode to the invention of the above application, the strength of the present well screen comes from the outer standoff layer. The intention was to provide separation of the various filter layers and so the main structural element within the present invention is in fact the outer standoff layer acting as a skeleton to assist against collapse of the outer cover. This inner skeleton provides the structural strength to maintain the well screen against collapse of the well bore. If we compare this to the well screen of Bode having the main structural element as the outer cover member, the present invention, in my opinion functions quite differently compared to that of Bode.

8. In my opinion a well screen having a collapsible outer cover with a construction which is less rigid than the construction of the outer stanoff layer will function like a human skeleton. Whereas an outer member that is constructed to withstand down hole radial pressures will act more like an the shell of an insect. These are very different structural systems.

9. I hereby delcare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that wilful false statements and the like so made are punishable by fine or imprisonment or both under Section 1002 of Title 18 of the United States code and that such wilful false statements may jeopardise the validity of the application. Any patent issuing thereon or any patent to which this rule 132 Declaration is directed.

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Signature: Graeme Dowsett

Date: 20/02/2009.